

CC TO JUDGE DM

THE HONORABLE BARBARA J ROTHSTEIN

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AT SEATTLE
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WESTERN DISTRICT OF WASHINGTON
BY DEPUTY

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

QWEST COMMUNICATIONS
INTERNATIONAL INC , a Delaware
corporation, and QWEST
COMMUNICATIONS CORPORATION, a
Delaware corporation,

Plaintiffs,

v

ONEQWEST, LLC, a Florida limited liability
company,

Defendant

NO C 02-829R

QUEST'S MOTION FOR CONTEMPT
OF COURT ORDER AND FOR
SANCTIONS

NOTE ON MOTION CALENDAR:
November 1, 2002

1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31 32 33 34 35 36 37 38 39 40 41 42 43 44 45 46 47

CV 02-00829 #00000034

QUEST'S MOTION FOR CONTEMPT OF COURT
ORDER AND FOR SANCTIONS (NO C 02-829R)

[13141-0485/LA022850 018]

ORIGINAL

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I. INTRODUCTION

By this Motion, Plaintiffs Qwest Communications International Inc and Qwest Communications Corporation (hereinafter collectively referred to as plaintiff "Qwest") seek dispositive and issue sanctions against Defendant OneQwest pursuant to Fed R Civ P 37, and the Court's inherent power, and an award of attorneys' fees and costs as additional sanctions Qwest submits that dispositive, monetary and issue sanctions are appropriate for four reasons

First, OneQwest has repeatedly violated Court orders that commanded OneQwest to come forward with its discovery of its financial records, its members and the relationship of the individuals and officers that promoted OneQwest's internet subscription sales

Second, OneQwest has already been sanctioned for failing to provide discovery about its business operations and for its willful conduct In addition, the Court has warned OneQwest that far more severe sanctions would be imposed against it should it fail to comply

Third, OneQwest has continuously violated the Court's Injunction, which ordered OneQwest to purge its websites and to stop using Qwest's famous marks in connection with its dubious multilevel marketing scam To this day, OneQwest is still using its infringing marks

Fourth, based on OneQwest's admissions and partial discovery responses, it is now clear that OneQwest's business activities were specifically designed to reap millions by defrauding the public into believing that it was purchasing "future internet minutes" under Qwest's famous marks

1 Qwest has been prejudiced by OneQwest's continued infringement and by its failure to
2 provide discovery Many months after discovery began, and after being ordered by this
3 Court to do so, OneQwest's refusal to provide the evidence that Qwest needs for trial proves
4 that, despite its various broken promises and contempts, it never intended to fulfill its duties
5 as a party—Default, issue sanctions and an award of attorneys' fees and costs pursuant to Fed
6 R Civ P 37 is therefore the only appropriate sanction The sanctions sought herein are
7 particularly tailored to the abuses committed and appropriate to deter profiteers of the
8 Internet from using well-known names to defraud the public and injure the companies they
9 infringe The sanctions sought are well within the acceptable range of sanctions as defined by
10 well-settled Ninth Circuit law Each of these points is treated in more detail below
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21 II. STATEMENT OF FACTS

22 Defendant OneQwest's conduct throughout this litigation has consisted of repeated
23 violations of each of the Court's various orders and its obligations under the Federal Rules of
24 Civil Procedure A more detailed briefing of the defendant's egregious conduct is set out in
25 the Plaintiff's CR 37 Submission and in the Discovery Report filed October 1, 2002.¹ See
26 Declaration of William C Rava in Support of Qwest's Motion for Contempt of Court Orders
27 and for Sanctions ("Rava Decl ") ¶2, Ex A (Discovery Report) (for the Court's convenience,
28 Qwest's Discovery Report is sequentially numbered for reference herein)
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37 A. The Court's April 2002 Temporary Restraining Order

38 Qwest filed the original Complaint against OneQwest on April 15, 2002 The
39 Complaint sought injunctive and monetary relief for trademark infringement, cyber piracy and
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45 ¹ It should be noted that defendant has not rebutted any of the long list of discovery violations
46 carefully set out in Plaintiff's Discovery Report filed two weeks ago Moreover, defendant had ample time to
47 provide supplemental (but untimely) responses but failed to do so

1 various other violations under federal and state law OneQwest sold memberships at a
2 charge of \$1,300 OneQwest marketed the memberships under the lure of "Inflated Income"
3 derived from selling subscriptions to others under a complex multi-level compensation
4 scheme See Declaration of William C Rava in Support of Qwest' Motion for TRO ¶ 3 (filed
5 April 15, 2002) Qwest also moved for a TRO, and the Court held a hearing on April 18,
6 2002 At that hearing, OneQwest was found to be infringing Qwest's famous marks and
7 working with a network of affiliated parties (Phil Piccolo, NetQwest, OneNet Place, etc) to
8 promote and extend a dubious multi-level marketing scheme—each level of which was
9 infringing Qwest's intellectual property rights The court stated

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11 **[T]here is no question that this is, as defendant has already**
12 **admitted, an infringing trademark.** It's so close There is no
13 question in the Court's mind that there's a likelihood of confusion here
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18 **What makes this even more serious is the fact that this is**
19 **occurring in an area that's almost identical to the area in which**
20 **Qwest operates. I think that the Court will be granting a TRO And**
21 **one of the reasons – not only is the Court finding infringement, but the**
22 **Court finds that the public interest requires a TRO I think that**
23 **[consumers] will be led to believe that they're dealing with, again,**
24 **a major corporation on a nationwide scale with a history of**
25 **reliability. And therefore, I think there's a real public interest in**
26 **stopping [OneQwest] right now** ²
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28 Rava Decl ¶3, Ex B (April 18, 2002 Transcript of Proceedings ("Transcript")) at pp 26-27)
29 (emphasis added)
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44 ² Qwest demonstrated in its opening brief that OneQwest's business operations met all of the criteria
45 of an illegal pyramid scheme While defendants have claimed that their business is legitimate, zero evidence
46 has been produced to date to rebut any of these conclusions or to support OneQwest's contention made at the
47 TRO hearing that their business was a legitimate multilevel marketing business like the noted Amway
company *Webster v Omnutrition International, Inc* 74 F 3d 776, 781 (9th Cir , 1996)

1 The Court sternly warned OneQwest that

2 [t]here should be **absolutely no solicitation from any new accounts**
3 **or new customers in any form** And I don't know how many
4 different forms—advertising, solicitation, business pitches, you name
5 it—were taking place **That should stop right away.**
6

7
8 I think—incidentally, I'm not going to give [OneQwest] 30 days. No
9 way I am persuaded that this is serious enough and things are
10 happening at a pace that's warranting shutting down the web site
11 **immediately there are thousands of perfectly innocent people**
12 **out there who may have paid money to buy into this**, that they
13 should be given some form of notice as to why there's a big dark hole
14 where [OneQwest was] communicating with the web site before I
15 mean [OneQwest] must have a list of people they're in touch with
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21 **And you've got to give them notice.** Because otherwise, they're all
22 going to be exposed to the fact that they're violating some trademark
23 infringement You've got to make this clear to these people They're
24 not going to know
25

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27 Rava Decl ¶3, Ex B (Transcript) at pp 28-29

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29 Consistent with the Court's admonitions at the hearing, the Court then entered a
30 written order on April 19, 2002 (the "April Order") OneQwest (and all affiliated parties)
31 were ordered to *immediately cease and desist using* the name "OneQwest" and all other
32 confusingly similar marks The April Order also required OneQwest to notify and
33 communicate the substance of the April Order to OneQwest's affiliated parties, agents and
34 customers "including without limitation Phil A Piccolo, PAP, Net Tech Investments, and
35 NetQwest "
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39 Astonishingly, while OneQwest did take its primary website down, it continued to
40 violate the Court's Order and infringe Qwest's famous mark in connection with its business
41 practices Qwest identified the continued infringements to OneQwest and demanded
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1 immediate compliance with the Court's April Order See Rava Decl ¶¶ 4, 5 & 6, Exs C, D
2 & E. In fact, defendant OneQwest never actually removed the infringing content as the
3 Court ordered *Even today OneQwest's new website and the source code underlying that*
4 *website still use "OneQwest"* and thus still violates the Court's April Order Rava Decl ¶7,
5 Ex F Obviously, OneQwest never took the Court's Order seriously The innocent public
6 can still be misdirected to this very day
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12 OneQwest has also disobeyed the portion of the April Order requiring it to notify its
13 affiliated infringers and customers In response to specific requests seeking documents to
14 confirm OneQwest's compliance, apart from the initial website posting, Defendant has not
15 produced a single document demonstrating that it notified anyone about the infringement As
16 a result, Qwest has been unable to confirm that any of the admitted 90,000 signed-up
17 OneQwest customers are aware that their continued use of the "OneQwest" name is illegal
18 This conduct is particularly egregious in view OneQwest's distribution of duplicating
19 OneQwest websites, which, in turn, create still further geometrically expanding infringements
20 Rava Decl ¶2, Ex B (Transcript) at pp 22-25
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31 **B. OneQwest's Violation of the Court's September 2002 Discovery Order**

32 Qwest diligently sought discovery by way of document requests and interrogatories
33 related to (1) the relationship between OneQwest and the network of affiliated parties that
34 assisted OneQwest, (2) OneQwest's compliance or lack thereof with the April Order and (3)
35 the profits realized by the infringement Specifically, Qwest sought the evidence and financial
36 data as to where the money from its memberships went and how many were sold After
37 being given substantial extensions of time, OneQwest finally served its initial responses to
38 Qwest's discovery requests on August 22, 2002 (the "Initial Responses")
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1 The Initial Responses, however, were nonresponsive and blatantly evasive. In the
2 Initial Responses, OneQwest used the bulk of its 90,000 internet sign-ups as grounds for
3 arguing that such a list would be burdensome to produce. See Rava Decl ¶2, Ex A
4 (Discovery Report) at A-3. Not a single document was produced. After numerous broken
5 promises by OneQwest, Qwest was forced to compel the discovery. Qwest gave OneQwest
6 still further opportunity to comply by virtue of the fact that Qwest employed the procedure of
7 a CR 37 submission. One day after the submission of its portion of the Rule 37 brief was
8 due, OneQwest provided supplemental responses and only 26 pages of documents (the "First
9 Supplemental Responses"). Furthermore, while it alleged that only a portion of its 90,000
10 members paid the \$1,300, OneQwest failed to provide the underlying financial data which
11 would corroborate or refute this bald assertion. See Rava Decl ¶2, Ex A (Discovery
12 Report) at A-30.

13 On September 23, 2002, this Court held a telephonic hearing regarding the Motion to
14 Compel. At the hearing, the Court stated that OneQwest's Initial Responses were "woefully
15 inadequate," and awarded Qwest its attorneys' fees for bringing the motion. It also again
16 sternly warned OneQwest that it would impose more severe sanctions if the defendant did not
17 fully and completely provide discovery, including producing relevant documents, by
18 September 27, 2002. See Rava Decl ¶8 at Ex G (September Order).

19 Defendant's counsel argued that it would be too burdensome to produce the over
20 90,000 membership lists. Plaintiff's counsel pointed out that, if OneQwest did not produce
21 data sufficient to determine its membership and the revenues received from such
22 memberships, Plaintiff could not prove OneQwest's profits. The Court specifically noted that
23 if OneQwest continued to fail to provide the documents of its 90,000 members, Qwest could
24 be entitled to contend, in view of the failure to produce, that Qwest's damages could be the

1 total number of sign-ups multiplied by the cost of a membership for becoming a OneQwest
2 member
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4 The Court also instructed Qwest to file a report with the Court on October 1, 2002
5 indicating defendant's compliance or lack thereof with the September Court's Order.
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7 OneQwest, however, never complied with the Order compelling further discovery and
8 ignored the Court's stern warnings. Qwest then filed its Discovery Report detailing
9 defendant's further abuses on October 1, 2002. In the Discovery Report, Qwest indicated
10 that it would be seeking further sanctions by way of this Motion as the Court indicated it
11 would consider at the September hearing.
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18 **III.**

19 **ONEQWEST SHOULD BE SANCTIONED TO PRESERVE THE**
20 **INTEGRITY OF THE COURT, ADDRESS THE PREJUDICE THAT**
21 **HAS BEFALLEN QWEST AND TO DETER ONEQWEST AND**
22 **CYBER PIRATES LIKE ONEQWEST FROM SIMILAR CONDUCT**
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25 **A. Dispositive Sanction Is An Appropriate Sanction In This Case.**
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27 In view of the various abuses and violations of the Court's Orders, severe sanctions
28 are warranted in order to preserve the integrity of the Court's docket and the orderly
29 administration of justice and may be imposed pursuant to the Court's inherent authority. See
30 *Chambers v NASCO*, 111 S Ct 2123, 2136 (1991).
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35 Rule 37 of the Federal Rules of Civil Procedure also provides sanctions to deter
36 exactly the type of discovery abuses and acts of contempt of court that OneQwest has
37 consistently committed since the beginning of this case. Fed R Civ P 37(b)(2)(c) and (d)
38 provide two independent grounds for granting dispositive sanctions. Fed R Civ P
39 37(b)(2)(c) mandates "an order dismissing the action or . . . rendering a judgment by
40 default" for failure to obey a discovery order.
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1 Dismissal is appropriate under Rule 37(b) whenever "a party has acted willfully or in
2 bad faith in failing to comply with the rules of discovery or with Court Orders enforcing the
3 rules " *G-K Properties v. Redevelopment Agency of the City of San Jose*, 577 F 2d 645, 647
4 (9th Cir 1978) (dismissal for last minute tender of relevant documents), *see also National*
5 *Hockey League v. Metropolitan Hockey Club, Inc.*, 427-U S 639, 641, 96 S Ct 2778
6 (1976) (dismissal is also proper to deter other litigants)
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12 Dismissal under Fed R Civ P 37(b) is permitted even absent willfulness or bad faith.
13 *See United Artists Corp v. La Cage Aux Folles, Inc.*, 771 F 2d 1265 (9th Cir. 1985)
14 (dismissal for failure to respond to Interrogatories without finding of willfulness or bad faith)
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18 Alternatively, Fed R Civ P 37(d) mandates dismissal for, *inter alia*, failure to
19 respond to interrogatories Under Rule 37(d) no prior Court Order is needed *See*
20 *Minnesota Mining & Manufacturing Co. v. Eco Chem, Inc*, 757 F 2d 1256 (Fed Cir
21 1985) (entry of default judgment for improper response to interrogatories in absence of prior
22 Court Order compelling response)
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28 Dismissal rests soundly with the discretion of the Court *G-K Properties*, 577 F 2d at
29 647 The Ninth Circuit has spoken on the use of dismissal as a discovery sanction against
30 recalcitrant parties
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34 "We encourage such orders Litigants who are willful in halting the
35 discovery process act in opposition to the authority of the court and
36 cause impermissible prejudice to their opponents It is even more
37 important to note, in this era of crowded dockets, that they also
38 deprive other litigants of an opportunity to use the courts as a serious
39 dispute-settlement mechanism "
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42 *G-K Properties*, 577 F 2d at 647
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1 Because OneQwest has repeatedly and in bad faith disobeyed the various Court
2
3 Orders and stern warnings, default under Fed R Civ P 37(b)(2) for failure to obey a Court's
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5 Order is warranted Further, since OneQwest failed to respond to Qwest's discovery,
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7 dismissal under Fed R Civ P 37(d) for failure to respond is also appropriate
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10 Additionally, OneQwest's frivolous supplemental responses, which frustrated the
11
12 intent of the Court Order compelling discovery by providing no meaningful discovery also
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14 justifies dismissal for a failure to respond since evasive or incomplete answers, under Fed R.
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16 Civ P 37(a)(3), are to be treated as if no answer was made *See also Minnesota Mining,*
17
18 *757 F 2d at 1261*
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22 The Court must consider five factors in assessing the propriety of a case-dispositive
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24 sanction. (1) the public's interest in expeditious, resolution of litigation, (2) the court's need
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26 to manage its dockets, (3) the risk of prejudice to the moving party, (4) the public policy
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28 favoring disposition of cases on their own merits, and (5) the availability of less drastic
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30 sanctions *See Fair Housing of Marin v. Combs*, 285 F 3d 899, 905-06 (9th Cir 2002)
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34 Here, all five factors favor dispositive sanctions The public certainly has an interest in
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36 ending OneQwest's abuses The Court has need to manage its docket without the constant
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38 intervention required by OneQwest's ongoing contempts Qwest has and is being prejudiced
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40 by OneQwest's refusal to provide discovery and its ongoing infringement OneQwest has had
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42 ample opportunity to avail itself of a disposition on the merit, and has been repeatedly
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1 warned Finally, lesser sanctions were previously imposed but did not deter OneQwest in the
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3 slightest, thus proving that lesser sanctions would be to no avail
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7 **B. The Court Should Sanction OneQwest For Violating the September**
8 **Order By Deeming Issues For Which Discovery Was Sought But Refused**
9 **As Established For Purposes of This Action.**
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11 Under Fed R Civ P 37(b), "the court may make such orders in regard to the
12 failure as are just " Rule 37(b)(2)(A) specifically authorizes entry of
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15 An order that the matters regarding which the [original, defied] order
16 was made or any other designated facts *shall be taken to be*
17 *established for the purposes of the action in accordance with the*
18 *claim of the party obtaining the order* (Emphasis added)
19

20 The sanction need only bear "a reasonable relationship to the subject of discovery that was
21 frustrated by the sanctionable conduct," for it to be upheld *Navellier v. Sletten*, 262 F 3d
22 923, 947 (9th Cir 2001)
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26 In *Refac Int'l, Ltd. v Hitachi, Ltd*, 921 F 2d 1247 (Fed Cir 1990), interpreting
27 Ninth Circuit law, a finding of non-infringement was imposed because the plaintiff failed to
28 provide sufficient details about the infringement A sanction of non-infringement under Rule
29 37(b)(2)(A) was deemed particularly appropriate since this was the very discovery that Refac
30 failed to provide
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39 Here, the same is true with respect to the issue preclusive sanctions sought herein
40 Qwest has sought discovery about the role of Keith Johnson, Phil Piccolo and William
41 O'Keefe, NetQwest and OneNet Place in the business operations of OneQwest and the
42 decision to willfully infringe Since OneQwest has failed to provide discovery on this issue,
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1 for purposes of the present case against OneQwest, that it be taken as established that
2 OneQwest admits that these individuals and co-infringers NetQwest and OneNet Place are
3 personally and, additionally liable for this action Keith Johnson and William O'Keefe are
4 officers of OneQwest It is well settled under Ninth Circuit law that officers and directors of
5 a corporation are personally liable for trademark infringement and unfair competition See
6 *The Committee for Idaho's High Desert, Inc. v. Yost, et al.*, F 3d 814, 823-24 (9th Cir 1996)
7 In addition, OneQwest admitted that Phil Piccolo is the "Master Distributor" for OneQwest
8 By his actions, Mr Piccolo personally contributed to the infringement of Qwest's intellectual
9 property and he should also be held personally liable ³

10 There is no dispute that OneQwest sells its subscription for \$1,300 It has admitted
11 90,000 customers, yet failed to provide complete discovery about them Discovery on the
12 financials was also not provided Because Defendant has concealed this discovery, Qwest
13 has no way to prove the profits realized by OneQwest It is therefore entirely appropriate to
14 have as a discovery sanction the fact deemed established that the 90,000 customers paid
15 \$1,300 00 each for a subscription

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31 **C. An Award of Attorneys' Fees and Costs Is Another Appropriate**
32 **Sanction In This Case.**

33 Fed. R. Civ P 37(b) and (d) provide that the Court shall require payment of
34 attorneys' fees and costs against the disobedient party "unless the Court finds that failure to
35 comply was substantially justified." In this case, there is absolutely no justification
36 OneQwest's failure to completely respond several times to Interrogatories and document
37 requests and to honor promises made at meet and confers and its several acts of civil
38 contempt all warrant the imposition of fees and costs Because OneQwest has intentionally
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³ Concurrently, Qwest is filing an Amended Complaint to add these parties as defendants


1 caused defendants unnecessary expense, it should be made to pay the price for its conduct
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3 *Chambers*, 111 S Ct at 2136
4

5 **IV. CONCLUSION**

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7 For the reasons set forth above, the court should grant Qwest's motion and enter the
8
9 proposed Order set forth
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11
12 DATED October 17, 2002
13

14
15 **PERKINS COIE LLP**

16
17 By 
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19 William C Rava, WSBA #29948
20
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22
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